

Ann D. Berkowitz Project Manager – Federal Affairs

January 8, 2003

1300 I Street, NW Suite 400 West Washington, DC 20005 (202) 515-2539 (202) 336-7922 (fax)

Ex Parte

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Application by Verizon Maryland, Verizon Washington, DC and Verizon West

Virginia for Authorization To Provide In-Region, InterLATA Services in States of

Maryland, Washington, DC and West Virginia, WC Docket No. 02-384

Dear Ms. Dortch:

Per the request of the Wireline Competition Bureau staff, Verizon is providing the attached Public Service Commission of the District of Columbia Order No. 12626 dated January 6, 2003 and Verizon Washington, DC's Response in Compliance with Order No. 12626 filed January 7, 2003. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 02-3511.

Sincerely,

Attachments

cc: G. Cohen

G. Gooke

G. Remondino

and Butor

V. Schlesinger

J. Dygart

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA 1333 H STREET, N.W., SUITE 200, WEST TOWER WASHINGTON, DC 20005

ORDER

January 6, 2003

FORMAL CASE NO. 962, IN THE MATTER OF THE IMPLEMENTATION OF THE DISTRICT OF COLUMBIA TELECOMMUNICATIONS COMPETITION ACT OF 1996 AND IMPLEMENTATION OF THE TELECOMMUNICATIONS ACT OF 1996; FORMAL CASE NO. 1011 – IN THE MATTER OF VERIZON WASHINGTON DC, INC.'S COMPLIANCE WITH THE CONDITIONS ESTABLISHED IN SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996, Order No. 12626

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") declares that the only unbundled network element ("UNE") rates Verizon Washington DC, Inc. ("Verizon DC") is authorized to use are those set forth in Commission Order No. 12610. Because Verizon DC has filed a petition for reconsideration of Order No. 12610, implementation of the rates in Order No. 12610 will be stayed and the applicable rates will be those in effect prior to the issuance of that Order. In no event is Verizon DC authorized to use rates established in New York, benchmarked or otherwise.

II. DISCUSSION

2. On December 6, 2002, the Commission released Order No. 12610, establishing UNE and resale discount rates for the District of Columbia. Shortly thereafter, on December 19, 2002, Verizon DC filed its Section 271 application for the District of Columbia, Maryland, and West Virginia with the Federal Communications Commission ("FCC"). In that application, Verizon DC states:

[t]he District of Columbia PSC has recently completed a pricing proceeding in which it adopted UNE rates that are substantially below the range that a reasonable application of TELRIC principles would produce. Verizon accordingly intends to petition

Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996 ("F.C. 962"), Order No. 12610, rel. December 6, 2002.

Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996, Verizon Washington DC, Inc.'s Application for Partial Reconsideration and Clarification of Order No. 12610 ("Verizon DC Reconsideration"), filed January 3, 2003.

the PSC to reconsider its decision. Pursuant to District of Columbia law, Verizon's petition will trigger a stay of the new rates until the PSC issues a final determination on the petition. While the rates are stayed, Verizon will offer UNE rates in the District that are the lower of the previous rates in effect in the District prior to the PSC's recent decision, or the comparable rates recently adopted in New York, adjusted where possible to account for cost differences between DC and New York. This approach is consistent with Commission precedent and ensures that the rates in effect in the District will be within (or below) the TELRIC range.³

- 3. The majority views this filing as a clear statement of Verizon DC's intent to use New York rates in some circumstances even though the Commission has not approved them. Our colleague apparently reads Verizon DC's filing differently and is of the opinion that it is merely an expression of the company's desire to use the New York rates, not an intent to implement them. Verizon DC subsequently filed a letter with this Commission stating its intent to seek reconsideration of Order No. 12610 and, during the pendency of that appeal, to implement interim UNE rates set at "either the levels in effect prior to December 6, 2002 or at levels benchmarked to the TELRIC-compliant rates in New York whichever is lower."
- 4. Contrary to our colleague's opinion, there is nothing remotely speculative about Verizon DC's intentions or the basis for this Order. Verizon DC has made statements before both the FCC and the Commission that express its unequivocal intent to implement New York rates, as it deems appropriate, and there is nothing in either statement that conditions the company's use of those rates on our approval. Under these circumstances, we cannot simply sit mum, as Commissioner Rachal, suggests and, by our silence, inadvertently give the impression that we condone Verizon DC's actions.

In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Verizon West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia, Verizon Brief at 47.

Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996; Formal Case No. 1011 – In the Matter of Verizon Washington DC, Inc.'s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996, Letter from Marie C. Johns, President, Verizon Washington, DC Inc., to Commissioners Angel M. Cartagena, Jr., Agnes Alexander Yates, and Anthony A. Rachal, filed December 26, 2002. AT&T Communications of Washington D.C., L.L.C. ("AT&T") subsequently filed a letter opposing Verizon DC's statements with this Commission. See, Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996; Formal Case No. 1011 – In the Matter of Verizon Washington DC, Inc.'s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996, Letter to Sanford M. Speight, Acting Commission Secretary from Mark Keffer, Vice President, Law and Government Affairs, AT&T, filed January 2, 2003.

Order No. 12626

- 5. Thus, we clarify that Verizon DC has several choices at this juncture. It can: (1) implement the rates approved in Order No. 12610; (2) petition the Commission for new rates; or (3) request that the approved rates not be stayed. Inasmuch as the company has already filed an application for reconsideration, by operation of law, the applicable rates will be the rates that were in effect prior to the issuance of Order No. 12610. However, there is no law, rule, regulation, or policy under which Verizon DC may implement rates of its own choosing without Commission approval.
- 6. As Verizon DC is aware, the Commission's consultative report, regarding the company's Section 271 application, is due to the FCC on January 9, 2003. Any attempt by Verizon DC to flout an Order of the Commission, either in whole or in part, may constitute sufficient reason to recommend to the FCC that the company's Section 271 application be denied.

THEREFORE, IT IS ORDERED THAT:

7. Verizon DC is prohibited from using New York unbundled network element rates, or any other unbundled network element rates, unless this Commission has approved them.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:

CHIEF CLERK

ACTING COMMISSION SECRETARY

D.C. Code, 2001 Ed. § 34-604(b) governs applications for reconsideration and provides for an automatic stay. Pursuant to this provision, the utility may request that the order not be stayed pending review of the application for reconsideration.

⁶ Id.

D.C. Code, § 34-601 prohibits a public utility from changing rates without the approval of the Commission.

See, In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Verizon West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia, Public Notice, DA 02-3511, rel. December 19, 2002.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA 1333 H STREET, N.W., SUITE 200, WEST TOWER WASHINGTON, DC 20005

DISSENT OF COMMISSIONER ANYTHONY M. RACHAL III

Order No. 12626

January 6, 2003

FORMAL CASE NO. 962, IN THE MATTER OF THE IMPLEMENTATION OF THE DISTRICT OF COLUMBIA TELECOMMUNICATIONS COMPETITION ACT OF 1996 AND IMPLEMENTATION OF THE TELECOMMUNICATIONS ACT OF 1996; FORMAL CASE NO. 1011 – IN THE MATTER OF VERIZON WASHINGTON DC, INC.'S COMPLIANCE WITH THE CONDITIONS ESTABLISHED IN SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996, Order No. 12626

I. BACKGROUND:

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") attempts to clarify a representation made by Verizon Washington DC, Inc. ("Verizon DC") and its parent company, Verizon Communications, Inc. ("Verizon") in Verizon's Section 271 application before the Federal Communications Commission ("FCC"). The majority opinion concludes that Verizon cannot use unbundled network element ("UNE") rates based on UNE rates from New York with adjustments for the District of Columbia ("New York adjustments") in lieu of either the rates established in this Commission's Order No. 12610 or the rates effective prior to the issuance of that Order, as its UNE rates in its Section 271 application. For the following reasons, I must again dissent in this matter for the reasons set forth below:

Under Section 271 of the Telecommunications Act of 1996, a regional bell operating company ("RBOC") may petition the FCC for permission to provider interLATA telecommunications services in each state. The RBOC will be granted that permission if it satisfies a 14-point checklist to demonstrate that its local exchange market is open to competition.

In the Matter of Application of Verizon Maryland, Inc., Verizon Washington DC, Inc., and Verizon West Virginia, Inc., et al. Pursuant to Section 271 of the Telecommunications Act of of 1996 to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia, WC Docket No. 02-384, filed December 19, 2002.

Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996, Order No. 12610, rel. December 6, 2002.

Order No. 12626

Page 2 of 3

II. DISCUSSION:

- 2. This Order is unnecessary in that Verizon-DC's Application for Partial Reconsideration and Clarification of Order No. 12610⁴ is pending before this Commission, and the basis for the issuance of this Order is pure speculation until this matter is formally considered by this Commission.
- 3. This Order has consumed valuable Commission resources and countless hours of staff time during the holiday period that might have been directed to other pending matters before this Commission.
- 4. This Order reflects badly upon the Commission, which has taken over two years to address this Section Number 271 proceeding, but in a matter of a month since the date of Order No. 12610, can expediently issue an Order to address a matter, which needs no clarification at this time.
- 5. Moreover, in light of Verizon-DC's Application for Reconsideration, the UNE rates established in Commission Order 12610 will be automatically stayed consistent with Commission regulations, pending the ultimate resolution of this matter.
- 6. Accordingly, the majority is correct in that this would reinstate the "proxy" UNE rates replaced by Order No. 12610. Verizon-DC has only indicated that it wishes to substitute the new New York rates as adjusted for the District of Columbia factors for the "proxy" UNE rates. This must be done by a request to this Commission. If not agreed to, this Commission can then enforce the utilization of the proper rates, should Verizon-DC proceed without appropriate authority.
- 7. Clearly, while the matter of permanent UNE rates is pending before this Commission, it is in the best interest of District ratepayers for this Commission to take up Verizon-DC's Application for Reconsideration on an expedited basis, by issuing an appropriate scheduling Order. This Commission should give serious consideration to Verizon-DC's proposal to charge lower interim UNE rates that conform to New York's TELRIC based UNE rates. As acknowledged by the parties, the alternative is to revert back to the higher non-TELRIC based "proxy" UNE rates that were in place in the District of Columbia prior to the issuance of Order No. 12610. This alternative would unnecessarily delay the introduction of lower UNE rates in the District of Columbia, and unduly burden Competitive Local Exchange Carriers and District ratepayers as a whole.

Formal Case No. 962, In the Matter of the Implementation of the District of Columbia Telecommunications Competition Act of 1996 and Implementation of the Telecommunications Act of 1996, Verizon Washington, D.C. Inc.'s Application for Partial Reconsideration and Clarification of Order No. 12610, ("Verizon-DC's Application for Reconsideration"), filed January 3, 2003.

D.C. Code, 2001 Ed. § 34-604(b).

PUBLIC SERVICE COMMISSION

202-393-1389

Page 3 of 3

Order No. 12626

06 03 05:43p

III. THEREFORE:

- 8. This Order is premature and inappropriate at this time.
- 9. For the aforementioned reasons, I must dissent from the majority opinion regarding this matter.

LEFTWICH & DOUGLAS, P.L.L.C.

SUITE 600 1401 NEW YORK AVENUE, N.W. WASHINGTON, D.C. 20005-6200

(202) 434-9100 FACSIMILE (202) 783-3420 WILLIE L. LEFTWICH, P.C. RETIRED

January 7, 2003

BY HAND

Sanford M. Speight, Esquire Acting Secretary The Public Service Commission of the District of Columbia 1333 H Street, N.W. Second Floor, West Wing Washington, D.C. 20005

Re: Formal Case No. 962 – Verizon Washington, DC Inc.'s Response in Compliance with Order No. 12626

Dear Mr. Speight:

Enclosed for filing are the original and fifteen (15) copies of Verizon Washington, DC Inc.'s Response in Compliance with Order No. 12626.

If you have any questions regarding this filing, please call me.

Respectfully,

Natalie O. Ludaway

Enclosure

cc: See Service List

BEFORE THE PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

	ដ	
IN THE MATTER OF THE IMPLEMENTATION) = =	
OF THE DISTRICT OF COLUMBIA		
TELECOMMUNCIATIONS COMPETITION)	
ACT OF 1996 AND IMPLEMENTATION OF) Formal Case No. 962, 🙄	
THE TELECOMMUNCIATIONS ACT OF 1996) and Formal Case No. 1011	
	X	
	' <u>⊗</u>	

VERIZON WASHINGTON, D.C. INC.'S RESPONSE IN COMPLIANCE WITH ORDER NO. 12626

On January 6, 2003, the Public Service Commission for the District of Columbia ("Commission") issued Order No. 12626 which ordered that "Verizon DC is prohibited from using New York unbundled network element rates, or any other unbundled network element rates, unless this Commission has approved them." Verizon DC wants to assure the Commission that it did not intend to charge any unbundled network element ("UNE") rates without the Commission's approval. Instead, any change in those rates proposed by Verizon DC would have to be accepted by a CLEC and incorporated into an interconnection agreement subject to the approval of the Commission.

Verizon DC regrets any confusion it may have caused about this process and therefore sets forth the following steps it has taken and will take to ensure that the Commission has the opportunity to approve any rates charged in the interim during the period the Commission's December 6, 2002, Order No. 12610 in Case 962 ("Final Order") is stayed:²

See Order No. 12626 at ¶ 7.

The Final Order is currently stayed by operation of law. Verizon DC filed its application for reconsideration on January 3, 2003. Under District law, that filing automatically stayed the Final Order. See D.C. Code § 34-604 (b).

- On December 18, 2002, Verizon DC sent to all CLECs operating in the District the letter and proposed UNE Pricing List set forth in Attachment A.³ The December 18 CLEC Letter is an offer from Verizon DC to CLECs to amend existing CLEC interconnection agreements, pursuant to Section 252(a)(1) of the federal Telecommunications Act of 1996, which explicitly authorizes Verizon DC and CLECs to voluntarily enter into binding interconnection agreements, "which shall include a detailed schedule of itemized charges for interconnection and each service or network element." Section 252(a)(1) also provides that any such voluntary agreement shall be "submitted to the State commission" for review and approval.
- 2. The offer in the December 18 CLEC Letter is explicitly limited to "any period starting on or after December 6, 2002, during which the rates in Order No. 12610 are not effective because that Order has been stayed."

 The December 18 CLEC Letter also states that the offered interim stay rates will be replaced by final approved rates when the stay ends:

 "Upon termination of any such stay, the rates from Order No. 12610, or such other rates as might be ordered by the PSC or a reviewing court, shall go into effect."
- 3. The December 18 CLEC Letter provides a mechanism for CLECs to accept the offered interim rates for application during a stay of the *Final Order*. For the convenience of the CLECs, they may signify their acceptance of Verizon DC's Section 252 offer by "payment of your first invoice in which Verizon has applied the new rates to a period covered in whole or in part by a stay of Order No. 12610." If a CLEC chooses instead to reject Verizon DC's offer, it will contact Verizon DC, instead of paying the invoice with the interim stay rates on it. It is unlikely that a CLEC will reject the offer, since the offer reduces many rates from what would otherwise be in effect during the stay, and increases no rates.
- 4. When a CLEC accepts the Section 252 voluntary agreement offer in the December 18 CLEC Letter, that will "result in [the interim stay rates] being incorporated into your interconnection agreement *subject to Commission approval* for the duration of any stays(s) of Order No. 12610." December 18 CLEC Letter (emphasis added). Thus the interim stay rates are not finally incorporated into a CLEC's agreement until approved by the Commission.

³ See Verizon DC letter to CLECs with UNE Pricing List, Dec. 18, 2002 (Attachment A) ("December 18 CLEC Letter").

5. The resulting interconnection agreement amendments will be filed with the Commission for its normal Section 252 review and approval, as required by Section 252(a)(1), (e)(1), and (e)(2)(A), and the Commission's rules for filing and review of interconnection agreements, 15 DCMR §§ 2600-2603 et seq. (2001). Upon Commission approval, the interim stay rate amendments will become binding on the parties.

Accordingly, by following the steps outlined above, Verizon DC is in compliance with the requirement of Order No. 12626 that no new rates go into effect "unless this Commission has approved them." When these voluntary interconnection agreement amendments are filed with the Commission for review under Section 252(e), the Commission should approve them because they are in the public interest.

In the absence of interim stay rates, like those offered in the December 18 CLEC Letter, the stay of the *Final Order* would put back into effect for the duration of the stay the "proxy" UNE rates used in the District before the *Final Order*. Neither the Commission nor the FCC has ever found these prior "proxy" rates to comply with TELRIC.

By contrast, the interim stay rates offered in the December 18 CLEC Letter do comply with TELRIC – because they are set to "benchmark" to FCC-approved New York TELRIC rates, unless a lower rate was available from the District's prior "proxy" rates. The interim stay rates in the December 18 CLEC Letter were chosen by selecting for each UNE rate, the *lower* of (1) the "proxy" rate that was in effect in the District before the *Final Order*, or (2) the equivalent UNE rate in New York, adjusted wherever possible to reflect cost differences between the District and New York, using the FCC's "benchmarking" process. Thus, none of the offered interim stay rates are higher than the

prior "proxy" rates, and the only "proxy" rates that remain are those that are equal to *or lower than* a rate benchmarked to the New York UNE rates.

Use of "benchmarked" rates for this purpose is appropriate because the FCC has repeatedly approved the use of rates "benchmarked" to the New York rates as appropriate TELRIC-compliant rates in other jurisdictions.⁴ The FCC's benchmark process starts with approved TELRIC-compliant New York rates, but adjusts them to reflect cost differences between the jurisdictions, as reflected in the FCC's Synthesis Cost Model.⁵ As indicated, this process is not unique to the District and has been used in a number of other states.

Verizon DC's use of "benchmarked" TELRIC rates as interim stay rates is also consistent with the Commission's conclusion that Verizon DC has met the requirements of Section 271 of the federal Telecommunications Act of 1996, and that the Commission supports Verizon DC's application to provide long distance service to residents of the District. TELRIC-compliant rates are required for a successful Section 271 application at the FCC – even in the interim while the rates set in the *Final Order* are stayed. But the prior "proxy" rates have not been found to comply with TELRIC, and therefore must be adjusted to ensure that they pass the FCC's benchmark test, as Verizon DC has done in the interim stay rates it has offered to the CLECs. Therefore, the rates offered in the

⁴ See Virginia § 271 Order ¶¶ 124, 126-129 ("Verizon's use of [benchmarked rates from New York] produced rates that are within the range that a reasonable application of TELRIC principles would produce."); see also Arkansas/Missouri § 271 Order ¶ 75; Rhode Island § 271 Order ¶ 55; Massachusetts § 271 Order ¶¶ 22-25.

⁵ See Virginia § 271 Order ¶¶ 91-92.

⁶ See In the Matter of Verizon Washington, DC Inc.'s Compliance with the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996, Letter from the District of Columbia Public Service Commission to the Federal Communications Commission, dated Dec. 19, 2002.

WHEREFORE, Verizon DC respectfully submits this response in compliance with Order No. 12626.

Respectfully submitted,

VERIZON WASHINGTON, DC INC.

David A. Hill (D.C. Bar No. 436538)
Verizon Washington, DC Inc.
1710 H Street, N.W.
Washington, D.C. 20006
(202) 392-5296

Natalie O. Ludaway (D.C. Bar No. 405149) Charniele L. Herring (D.C. Bar No. 468466) Leftwich & Douglas, P.L.L.C. 1401 New York Avenue, NW Suite 600 Washington, D.C. 20005 (202) 434-9100

January 7, 2003

CERTIFICATE OF SERVICE

I certify that on this 1 day of January, 2003, copies of Verizon Washington, DC Inc.'s Response in Compliance with Order No. 12626 were hand delivered to those indicated by [*] and mailed first class, postage prepaid, to all parties as indicated below.

Natalie O. Ludaway

*Sebrina A. McClendon, Esq. Lara Walt, Esq. The Public Service Commission of the District of Columbia 1333 H Street, N.W. 7th Floor Washington, D.C. 20005

Chana S. Wilkerson, Esq. WorldCom 1133 19th Street, N.W. 11th Floor Washington, D.C. 20036

Jeffrey Blumenfeld, Esq. Christy C. Kunin, Esq. Gary, Cary, Warer & Freidenrich. LLP 1625 Massachussetts Avenue, N.W. Suite 300 Washington, DC 20036 Elizabeth A. Noël, Esq. Sandra Mattavous-Frye, Esq. Brenda Pennington, Esq. Joy Ragsdale, Esq. Office of People's Counsel 1133 15th Street, N.W., Suite 500 Washington, D.C. 20005

Mark A. Keffer, Esq. Michael A. McRae, Esq. AT&T Communications of Washington, D.C., Inc. 3033 Chain Bridge Road Room 3D Oakton, VA 22185 David M. Janas Lisa N. Anderson Christopher R. Bjornson Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, P.C. 701 Pennsylvania Avenue, NW Washington, DC 20004

Robin F. Cohn, Esq. Ronald J. Jarvis, Esq. Andrew D. Lipman Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W. Suite 300 Washington, D.C. 20007-5116

Michael J. Ettner General Services Administration 18th & F Street, N.W. Suite 4002 Washington, D.C. 20405

Cynthia A. Coe, Esq. 5406 Kirkwood Drive Bethesda, MD 20816

Ralph McMillan, Chief Chuck Clinton, Director D.C. Energy Office 2001 14th Street, N.W. 3rd Floor Washington, D.C. 20009 Craig D. Dingwall, Esq. Sprint Communications Co., L.P. 401 9th Street, N.W. Suite 400 Washington, DC 20004

Anthony Richard Petrilla, Esq. COVAD Communications
Group Inc.
Hamilton Square
600 14th Street
Suite 750
Washington, D.C. 20005

Joseph O. Kahl, Director Residential Communications Network, Inc. 105 Carnegie Center Princeton, NJ 08540

Mitchell Bercher, Esq. Greenberg & Traurig 800 Connecticut Avenue, N.W. Washington, DC 20036

Roderic Woodson, Esq. Holland & Knight 2100 Pennsylvania Avenue, N.W. Washington, D.C. 20037 Edward Donohue Counsel for XO DC, Inc. Cole, Raywid & Braverman, L.L.P. 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, D.C. 20006

Angela Lee, Esq.
State Director of Government Affairs
AT&T Communications of Washington,
D.C., Inc.
1120 20th Street, N.W., Suite 1000
Washington, D.C. 20036

Esther Bushman, Esq.
Committee Clerk
D.C. Council Committee on
Consumer Regulatory Affairs
1350 Pennsylvania Avenue, N.W.
Suite 102
Washington, D.C. 20004

Cherie R. Kiser
Counsel for Intermedia Communications
Mintz, Levin, Cohn, Ferris, Glovsky and
Popeo, P.C.
701 Pennsylvania, Avenue, N.W.
9th Floor
Washington, D.C. 20004

John S. Ramsey Winstar Communications, Inc. 1200 19th Street, N.W., Suite 500 Washington, D.C. 20036

Morton J. Posner, Esq. Allegiance Telecom, Inc. 1919 M Street, NW Suite 420 Washington, DC 20036 Lisa N. Anderson Counsel for Net 2000 Communications of Virginia, LLC Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. 701 Pennsylvania Avenue, N.W. Washington, D.C. 20004

Kelly Faul Intermedia Communications 1 Intermedia Way Tampa, FL 33647

Ross A. Buntrock Counsel for E. Spire Communications, Inc. Kelley Drye & Warren, LLC 1200 19th Street, N.W. Suite 500 Washington, D.C. 20036

David Meyer Tax & Policy Administration Office of the Chief Financial Officer 1350 Pennsylvania Avenue, N.W. Room 209 Washington, D.C. 20004

Gale Smith Kalitsi
Focal Communications Corporation
200 N. LaSalle Street
Suite 1100
Chicago, IL. 60601

ATTACHMENT A

December 18, 2002

Subject: VERIZON WASHINGTON, DC: UNE Rates for Existing Interconnection Agreements

To: UNE CLEC Customers - Verizon Washington, DC

On December 6, 2002, the Public Service Commission of the District of Columbia issued Order No. 12610 in Formal Case No. 962, which ordered new rates for UNE products and services in Washington, D.C., effective immediately. Order No. 12610 is potentially subject to motions for reconsideration and/or judicial review, either of which might result in a stay of that Order for some period of time pending completion of reconsideration and/or review. In the event of such a stay, Verizon will offer revised rates.

A complete list of UNE products and services, and the associated revised rates, are provided in the Pricing List attached to this letter. An asterisk (*) identifies the rates that differ from those in effect before December 6, 2002. The rates in the attached Pricing List will become effective for any period starting on or after December 6, 2002, during which the rates in Order No. 12610 are not effective because that Order has been stayed. Upon termination of any such stay, the rates from Order No. 12610, or such other rates as might be ordered by the PSC or a reviewing court, shall go into effect.

Following your receipt of this notification, your payment of your first invoice in which Verizon has applied the new rates to a period covered in whole or in part by a stay of Order No. 12610 will signify your acceptance of these rates and will result in them being incorporated into your interconnection agreement subject to Commission approval for the duration of any stay(s) of Order No. 12610.

It is possible that the new UNE Pricing List will contain rates and/or charges for UNE products/services to which you are not entitled under the terms of your specific interconnection agreement with Verizon. The existence of such rates and/or prices in the new UNE Pricing List shall not be construed as an agreement by Verizon to provide you with any UNE other than those expressly provided for by the terms of your agreement. If your agreement with Verizon does not include terms providing a specific UNE product or service that Verizon is required by applicable law to provide you, you may contact your Verizon Account Manager to arrange for an appropriate amendment to your agreement.

ALL LUCKE STATE OF THE PROPERTY OF THE PROPERT		STEED ST
TINDIANDI ED NETWODY EL CHENYO	DC Rate	s in Event of
UNBUNDLED NETWORK ELEMENTS		f PSC 12/06
		Order
UNBUNDLED LOOP - per month		
2 Wire Basic Loop	\$	8.49
Off-Premise Extension (same as 2 Wire Loop)	\$	8.49
2 Wire Customer Specified Signalling Loop	\$	10.52
4 Wire/4 Wire Customer Specified Signalling Loop	\$	19.97
ISDN-BRI Loop	\$	12.36
Digital 4 Wire (56KD/64KD) Loop	\$	19.97
DS1/ISDN-PRI Loop	\$	72.65
DS3 Loop	\$	593.30
UNBUNDLED SUBLOOP ARRANGEMENTS - per month		
Subloop - Distribution		
2 Wire		2.07
4 Wire	\$ \$	3.87 6.36
	13	6.36
Subloop - Feeder		
2 Wire	\$	6.22
ISDN (2 Wire Digital)	\$	9.53
4 Wire	\$	16.34
DDS (4 Wire Digital)	\$	16.34
DS1	\$	69.95
DS3	\$	438.22
UNBUNDLED NETWORK INTERFACE DEVICE (NID)		
NID to NID Connection (per NID)	1	
2 Wire	\$	1.01
4 Wire	š	1.01
UNE Shared NID (per line)	\$	0.39
Standalone NID (per NID)	, i	
2 Wire	\$	1.01
4 Wire	\$	1.01
DS1	\$	4.49
Unbundled xDSL Conditioning & Qualification		
Mechanized Loop Qualification	s	0.40
Wideband Test Access	š	0.49 1.72
Non-Recurring	l*	1.72
Addition of Loop Electronics - Normal	s	938.26
Addition of Loop Electronics - Expedite	\$	946.08
Unbundled EEL Testing		
2 Wire Analog Test Charge	\$	0.43
2 Wire Digital Test Charge	\$	0.66
4 Wire Analog Test Charge	\$	1.08
DS1 (1.544 mbps) Test Charge	\$	4.17
Digital 4 Wire (56 or 64 kbps) Test Charge	\$	1.08
House and Riser		
Cable Investment per floor	\$	0.01
Building Access per pair	š	0.58
Non-Recurring	l'	5.55
50 Pair Terminal Charge	\$	262.00

UNBUNDLED NETWORK ELEMENTS		tes in Event of of PSC 12/06) Order
Unbundled EEL IOF	1	
Voice Grade Fixed includes both ends	\$	28.08
Voice Grade per Mile	\$	0.02
Line Sharing/Line Splitting	1	
Admin & Support	1	
Option A	s	36.17
Option C	ľŝ	36.17 36.17
Non-Recurring		36.17
Splitter Installation	s	1,287.36
	ľ	1,207.30
Splitter Equipment - Option C only	\$	4.78
Line Sharing and Line Splitting - OSS	s	
(Line Sharing & Subloop OSS)	\$	-
Unbundled Individual Line Port Features	ľ	-
Res/Bus Features		
Three Way Calling		
Return Call	ı	
Calling Number Delivery		
Calling Name and Number Delivery	I	
Anonymous Call Rejection	ı	- 1
Call Waiting Display (Name and Number)	1	
Remote Call Forwarding	l .	
Repeat Call	1	
Call Waiting		
PBX per MOU	s	0.003752
Multi-Line Hunting per MOU	\$	0.000002
Centrex Features	I	ı
Ctx Three-Way Calling	I	
Ctx Six-Way Conference	1	į
Ctx SMDR to Premise	i	
Ctx Repeat Call	I	
Ctx Distinctive Ringing	I	
Centrex Intercom	I	1
Ctx Loudspeaker Paging	I	l l
Ctx Meet Me Conference	I	
Ctx Announcement	I	
Call Transfer-All Calls		
Call Waiting Terminating (All Calls)		
Directed Call Pickup with Barge-In (Originating)		ŀ
Executive Busy Override	1	
Ctx Automatic Recall (Return Call)	ı	Į
UCD per MOU	\$	0.000005
Hunting per MOU	\$	0.000004
Queuing per MOU	\$	0.000968
Intercom & Features per MOU	\$	0.032910
Attendant per MOU	\$	0.034952
Attendant Console per MOU	\$	0.036556
Centralized Attendant Services per MOU	\$	0.353835
Attendant Access Code Dialing per MOU	ŝ	0.075992
	• *	0.070992

	The STORESTONE	10 11 10 10 10 10 10 10 10 10 10 10 10 1
CONTRACTOR OF CONTRACTOR CONTRACT	DC B	
UNBUNDLED NETWORK ELEMENTS:		ates in Event of of PSC 12/08
	9,3	Order
	2	
Automatic Route Selection per MOU	\$	0.000838
Electronic Tandem Switching per MOU	\$	0.001947
ISDN Features		
ISDN Intercom	1	
ISDN Announcement		
ISDN Six-Way Conference	1	
ISDN Three-Way Calling	1	
ISDN Call Pickup		
ISDN Selective Call Rejection	ł	
Calling Name and Number Delivery	Ī	
ISDN Call Transfer Individual - All Calls (Ftr. 578)		
ISDN Centrex Features	\$	0.010160
Unbundled Line Ports - per month		
POTS/PBX/CTX/UPALP Port (NY UNE-P associated rate)	\$	1.55
ISDN PRI Port	\$	161.19
ISDN Single line BRI or ISDN Centrex Port	\$	7.58
Direct Inward Dialing (DID) Port	\$	3.50
Automatic Identified Outward Dialing (AIOD) Port	\$	3.50
Unbundled Coin Port (UCP)	\$	2.62
Simplified Message Desk Interface (SMDI) Port	\$	267.34
Switched DS1 Port	\$	139.26
IDLC Port	\$	335.54
Unbundled Trunk Ports		
Dedicated Trunk Port - End Office (per month)	\$	67.96
Dedicated Trunk Port - Tandem (per month)	\$	67.96
Dedicated Trunk Port -TOPS (per month)	\$	34.56
Common Trunk Port - End Office (per mou)		incl. in
Common Trunk Port - Tandem (per mou)	8	witching
Common Trunk Port - TOPS (per mou)	l .	rates
	ľ	rates
Unbundled Switching - Per MOU		rates
Unbundled Switching - Per MOU Originating EO Local Switching per MOU	s	
Originating EO Local Switching per MOU	\$ \$	0.003000
1	\$	0.003000 0.003000
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU	\$ \$	0.003000
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU	\$	0.003000 0.003000 0.005758
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU	\$ \$ \$	0.003000 0.003000 0.005758 0.002669
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU	\$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching	\$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU	\$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching Tandem Switching MOU Common Transport - per MOU	\$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching Tandem Switching MOU	\$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching Tandem Switching MOU Common Transport - per MOU	\$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203 0.002669
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching Tandem Switching MOU Common Transport - per MOU Fixed	\$ \$ \$ \$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203 0.002669
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Originating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU UNDUNCHED Tandem Switching Tandem Switching MOU Common Transport - per MOU Fixed Per Mile	\$ \$ \$ \$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203 0.002669
Originating EO Local Switching per MOU Terminating EO Local Switching per MOU ISDN Originating Digital Switched Voice per MOU ISDN Terminating Digital Switched Voice per MOU ISDN Orignating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU ISDN Terminating Digital Circuit Switched Data per MOU Unbundled Tandem Switching Tandem Switching MOU Common Transport - per MOU Fixed Per Mile Recip Comp	\$ \$ \$ \$ \$ \$ \$ \$ \$	0.003000 0.003000 0.005758 0.002669 0.003203 0.002669 0.002532

INPLINITED NETWORKS TO THE STATE OF	no e	s in Event of
UNBUNDLED NETWORK ELEMENTS	Stavio	FIREVENCOR
		Order
Unbundled Dedicated Transport - per Month		
Entrance Facilities (For NY, add 4 quarter mile charges to the fixed rt	×	
DS-1 Entrance Facility	\$	102.75
DS-3 Entrance Facility	\$	827.27
STS-1 Entrance Facility	\$	278.83
OC-3 Entrance Facility	\$	903.43
OC-12 Entrance Facility	\$	2,749.84
Interoffice Facilities (IOF)		
DS-3 Fixed includes both ends		
DS-3 per Mile	\$	711.09
DS-1 Fixed includes both ends	\$	15.21
DS-1 per Mile	\$ \$	54.00
OC-3 - Fixed includes both ends	\$	2.05
OC-3 - per mile	\$	2,061.50 31.45
OC-12 - Fixed includes both ends	\$	3,333,63
OC-12 - per mile	\$	89.82
STS-1 - Fixed includes both ends	\$	674.62
STS-1 - per mile	\$	10.42
	*	10.42
STP Port Termination (Monthly)	\$	305.88
	,	000.00
SS7 Link (per mile)	\$	0.08
Unbundled Signalling Databases		
800 Database		
basic query	\$	0.000133
vertical query	\$	0.000540
LIDB (Per Query)		
Calling Card	\$	0.000094
Billed Number Screening	\$	0.000094
DARK FIBER - IOF		
Verizon CO to Verizon CO		
Serving Wire Center Charge/SWC/Pair		2.51
Per Mile	\$ \$	8.01
Verizon CO to CLEC CO	P	118.51
Serving Wire Center Charge/SWC/Pair	\$	8.01
Channel Termination Charge/CLEC CO	\$	60.31
3	Ψ	00.31
DARK FIBER - LOOP		ľ
Serving Wire Center Charge/SWC/Pair	\$	8.01
Loop Charge/Pair	\$	60.31
		-5.51
Customized Routing (per line per month)	\$	0.00235
Daily Usage File		
Per Record Recorded		0.0002810
Per Record Transmitted	\$	0.000101
Per Media (Tape or Cartridge)	\$	20.32
ONO Patrice (Amon III and III		ı
SMS Pricing (AIN Service Creation)		I
Service Creation Usage		ı

UNBUNDLED NETWORK ELEMENTS		ites in Event o of PSC 12/06
		Order
Remote Access per 24 Hr. day	\$	727.83
On Premise per 24 Hr. day	\$	727.83
Certification and Testing per Hour	Š	70.12
Help Desk Support per Hour	š	72.96
Service Charges	ľ	72.00
Subscription Charges	\$	0.22
Database Queries		
Network Query	\$	0.000954
CLEC Network Query	\$	0.000954
CLEC Switch Query	\$	0.000954
Utilization Element		
Service Modification		
DTMF Update Per Change	\$	0.15000
Service Order Input	1	
Switched Based Announcement		
Developmental Charges	1	
Service Creation Access Ports per month	\$	134.47
Operations Support Systems (per month/per line)		
Ongoing and Recovery of one time expense (during 10 yr. Period)	\$	-
Ongoing only (after 10 yr. Period)	\$	-



UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of PSC 12/06 Order
	1.90 (2.80 0)(06)
Unbundled Loops	
2W Analog Loop	
Service Order	5.00
Installation w/o Visit - Initial	14.00
Installation w/Visit - Initial	28.00
Installation w/o Visit- Add'l	14.00
Installation w/Visit- Add'l	28.00
4W Analog Loop	
Service Order	
Installation w/o Visit - Initial	5.00 14.00
Installation w/Visit - Initial	28.00
Installation w/visit - Initial	14.00
Installation w/Visit- Add'l	28.00
The state of the s	20.00
2W Customer Specified Signaling Loop	
Service Order	5.00
Installation w/o Visit - Initial	14.00
Installation w/Visit - Initial	28.00
Installation w/o Visit- Add'l	14.00
Installation w/Visit- Add'l	28.00
4W - Customer Specified Signaling Loop	
Service Order	5.00
Installation w/o Visit - Initial	14.00
Installation w/Visit - Initial	28.00
Installation w/o Visit- Add'l	14.00
Installation w/Visit- Add'l	28.00
ISDN BRI Loop	<u> </u>
Service Order	-
Installation w/o Visit - Initial	9.01
Installation w/Visit - Initial	19.99
Installation w/o Visit- Add'l	101.79
Installation w/Visit- Add'l	19.75 43.11
motunation wivion- Add 1	43.11
DS-1 Loop	
Service Order	9.01
Installation w/o Visit - Initial	40.27
Installation w/Visit - Initial	157.27
Installation w/o Visit- Add'l	23.53
Installation w/Visit- Add'I	98.59
DS3 Loop	
Service Order	45.98
Installation w/o Visit - Initial	158.27
Installation w/Visit - Initial	352.55

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of
	PSC 12/06 Order
ALCO TEXTELLIBRIUM TEXTE AND A STATE OF THE	
Installation w/o Visit- Add'l	158.27
Installation w/Visit- Add'l	282.75
mountain myot Add I	202.10
DDS/ 4W 56 KD Loop	
Service Order	9.01
Installation w/o Visit - Initial	40.27
Installation w/Visit - Initial	154.33
Installation w/o Visit- Add'l	23.53
Installation w/Visit- Add'l	62.28
Manual Surcharge	18.00
EXPEDITE	
Expedited Install w/o Visit - Initial	57.60
Expedited Install w/Visit - Initial	174.78
Expedited Manual Surcharge	22.23
2W ADSL Loop	
Service Order	10.94
Installation w/o Visit - Initial	19.99
Installation w/Visit - Initial	101.79
Installation w/o Visit- Add'l	16.51
Installation w/Visit- Add'l	43.11
4W xDSL Loop, 2W HDSL Loop	
Service Order	10.94
Installation w/o Visit - Initial	39.73
Installation w/Visit - Initial	153.79
Installation w/o Visit- Add'l	16.51
Installation w/Visit- Add'l	55.26
Distribution Two Wire Subloop	
Service Order	8.98
Installation - Prem Visit No-Initial & addl	
Installation - Prem Visit Yes - Initial	
Installation - Prem Visit Yes - Additional	
Installation - Initial	88.36
Installation w/o Prem Visit - Initial	
Installation - Addl	32.01
Installation w/o Prem Visit - Add'l	
Manual Surcharge	18.00
EXPEDITE	
Service Order -Expedite	11.42
Installation - Initial	124.48
Installation - Addl	45.11
Manual Surcharge	22.23
2Wire Subloop - Loop Through Conversion	T
Service Order	8.98
Installation - Initial	202.11
Installation - Initial	202.11

The Control of the Co	DC Rates In
UNBUNDLED NETWORK ELEMENTS	Event of Stay of
	PSC 12/06 Order
Installation - Addl	121.05
Manual Surcharge	18.00
EXPEDITE	10.00
Service Order	11.42
Installation - Initial	292.74
Installation - Addl	176.55
Manual Surcharge	22.23
3	22.20
Distribution Four Wire Subloop	
Service Order	8.98
Installation - Prem Visit No-Initial	1
Installation - Prem Visit No - Additional	
Installation - Prem Visit Yes - Initial	
Installation- Prem Visit Yes - Additional	
Installation - Initial	105.78
Installation w/o Prem Visit - Initial	
Installation - Addl	55.30
Installation w/o Prem Visit - Add'l	
Manual Surcharge	18.00
EXPEDITE	
Service Order -Expedite	11.42
Installation - Initial	149.01
Installation - Addl	77.91
Manual Surcharge	22.23
4Wire Subloop - Loop Through Conversion	
Service Order	8.98
Installation - Initial	204.94
Installation - Addl	133.64
Manual Surcharge	18.00
EXPEDITE	
Service Order	11.42
Installation - Initial	296.77
Installation - Addl	195.34
Manual Surcharge	22.23
Feeder DS1 Subloop	
Service Order	0.04
Installation - Initial/Migration	9.01 188.26
Intallation w/o Prem Visit - Initial	40.27
Installation - Additional	101.72
	101.72
Feeder DS3 Subloop	<u> </u>
Service Order	61.63
Installation	204.56
	204.00
Signaling and Databases	
	h

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of PSC 12/06 Order
STP Port	
Service Order	9.01
Per Port - Installation	113.93
	1.0.00
SS7 Link	
Service Order	25.37
Installation	134.27
	1 10 1121
SS7 Non-recurring Charges	
Rehome D-Link	233.01
A-Link to D-Link Converstion	174.76
Change in Hub Provider	116.51
STP Translations NRCs	
A-Link Basic Setup	72.09
A-Link ISUP/TCAP	59.13
A-Link Queries/CLASS/CNAM	64.81
A-Link CLEC to CLEC Access	59.13
D-Link Basic Setup	44.27
D-Link ISUP/TCAP	44.27
D-Link Queries/CLASS/CNAM	51.55
D-Link CLEC to CLEC Access	44.27
Subsequent Connect to same STP Pair	58.25
NPA/NXX CLASS Feature Input	29.13
End Office Translations - CLASS Features	9.90
	3.30
SS7 Testing	
Setup for MTP Lvis 2 & 3	543.70
Setup for ISUP	543.70
Setup for Queries/CLASS/CNAM	67.96
Certification for MTP Lvls 2 & 3	849.20
Certification for ISUP	1,273,81
Certification for 800 DB Queries	106.15
Certificat'n for LIDB/CLASS/CNAM	53.08
	00.00
LIDB Validation	
Data Storage - Service Establishment (NRC)	1,595.83
AIN O O	
AIN Service Creation (Access to SMS)	
Development Charges	
Service Order	9.01
Service Establishment	773.56
Service Creation Access Port	134.47
Service Creation Usage	
Remote Access per Day	727.83
On-Premise per Day	727.83

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay of
	PSC 12/06 Order
Certification & Testing per hour	83,57
Help Desk Support per hour	88.44
Service Charges	00.77
Subscription Charge per month	2.55
Network Query	0.0012
CLEC Network Query	0.0012
CLEC Switch Query	0.0012
Trigger Charge	
Line Based	0.0007
Office Based	0.0007
Utilization Element	0.0005
Network Service Activation	15.08
CLEC Network Service Activation CLEC Switch Service Activation	15.08
Service Modification - DTMF Update	15.08
Switch Based Announcement	0.15
Switch based Announcement	0.0068
Ports	
POTS/PBX/Centrex Ports	
Service Order	5.00
Installation - Initial	10.63
Installation - Add'l	10.63
	10.03
ISDN (PRI) Ports	
Service Order	31.98
Port Installation	
Installation - Initial	130.17
Installation - Add'l	130.17
ISDN (BRI) Ports	
Service Order	9.01
Installation - Initial	19.99
Installation - Add'l	19.99
DID Porto	
DID Ports	
Service Order	25.37
Installation - Initial	714.24
IDLC /TR008 Port	
-Service Order	1
-Installation	9.01 500.57
	500.57
Switched DS1 Port	
-Service Order	61.63
-Installation - Initial	458.36
-Installation -Additional	458.36
	400.30

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of PSC 12/06 Order
SMDI Port	
Port Installation	
-Service Order	9.01
-Installation	435.16
Unbundled Coin Port	
-Service Order	9.01
Installation	10.63
Installation - Addl	10.63
Unbundled Public Access Line Port	
-Service Order	9.01
Installation	10.63
Installation - Addl	10.63
	<u> </u>
POTS Features	
Service Order	9.01
Installation	
Centrex Features-MOU	
Service Order	9.01
Installation	
ISDN Centrex Feature - MOU	
Service Order	9.01
Installation	
Line Port Traffic Study	
Setup	21.15
Per Week	9.15
Twink Doute	
Trunk Ports Dedicated Trunk Port - End Office	
Service Order	0.04
Installation - Initial	9.01 557.39
Installation - Addl	557.39
	007.00
Dedicated Trunk Port - Tandem	
Service Order	9.01
Installation - Initial	493.96
Installation - Addl	493.96
Dedicated Trunk Port - TOPS	
Service Order	9.01
Installation - Initial	601.23
Installation - Addi	601.23

	DC Rates in
UNBUNDLED WETWORK ELEMENTS	
	PSC 12/06 Order
	12 00 00 00
IOF	
IOF DS1	
Service Order	
Installation - Initial Facility Installation - Addl Facility	
installation - Addi Facility	
IOF DS3	
Service Order	
Installation - Initial Facility	<u> </u>
Installation - Addi Facility	
matanation - Audi Facility	
IOF STS-1	
Service Order	
Installation	61.63
Manual Surcharge	196.60
EXPEDITE	7.95
Service Order	
Installation	78.08
	280.07
Manual Surcharge	9.83
IOF OC3	
Service Order	04.00
Installation	61.63
Manual Surcharge	236.66
EXPEDITE	7.95
Service Order	70.00
Installation	78.08 337.61
Manual Surcharge	9.83
inunual outcharge	9.03
IOF OC12	
Service Order	61.63
Installation	236.66
Installation - Initial	230.00
Installation - Addl	
Manual Surcharge	7.95
EXPEDITE	1.85
Service Order	78.08
Installation	337.61
Manual Surcharge	9.83
	9.03
Entrance Facilities	
DS1 Channel Term/Entrance Facility	
Service Order	64.60
Installation - Initial	61.63
Installation - Addl	144.10
motanativii - Auui	144.10

UNBUNDLED NETWORK ELEMENTS	DC Rates in
OUR OF THE WORK ELEMENTS	Event of Stay of PSC 12/06 Order
	1.00 12.00 0/Ide
DS3 Channel Term/Entrance Facility	
Service Order	61.63
Installation - Initial Installation - Addi	1.00
installation - Addi	1.00
Entrance Facilites STS-1 -recurring (Fixed)	
Service Order	61.63
Installation - W/Visit	349.38
Installation - Wout/Visit	198.10
Manual Surcharge	7.95
EXPEDITE	7.00
Service Order	78.08
Installation w/Visit	491.59
Installation wout/Visit	280.07
Manual Surcharge	7.95
Entrance Facilities OC3-recurring (Fixed) Service Order	ļ
Installation - W/Visit	61.63
Installation - Wout/Visit	349.38
Manual Surcharge	198.10
EXPEDITE	7.95
Service Order	70.00
Installation -W/Visit	78.08 491.59
Installation -Wout/Visit	280.07
Manual Surcharge	7.95
	7.55
Entrance Facilities OC12-recurring (Fixed)	
Service Order	61.63
Installation - W/Visit	349.38
Installation - Wout visit	198.10
Manual Surcharge	7.95
EXPEDITE	
Service Order	OF 07
Installation W/Visit	95.67 282.29
Installation w/out Visit	282.29
Manual Surcharge	7.95
	7.95
XDSL Loop Qualification & Conditioning	
Manual Loop Qualification	95.52
Engineering Query	137.52
Engineering Work Order	658.63
Bridge Tap Removal - One Occurrence	282.60
Bridge Tap Removal - Multiple Occurrence	688.26
Load Coil Removal - 21K Ft	1,253,83

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of PSC 12/06 Order
Load Coil Removal - 27K Ft	1,667.63
Cooperative Testing	34.92
Line Sharing	
CONNECT	
Service Order	9.01
Installation - Initial w/Visit	153.78
Installation - Initial wout/Visit	39.72
Installation - Addl w/Visit	133.81
Installation - Addl wout/Visit	19.75
Manual Surcharge	26.56
EXPEDITE	
Service Order	13.99
Installation - Initial w/Visit	230.72
Installation - Initial wout/Visit	56.82
Installation - Addl w/Visit	200.87
Installation - Addl wout/Visit	28.25
Manual Surcharge	41.23
DARK FIBER	
Dark Fiber Loop	
Service Order	61.63
SWC Charge per pair (NRC)	37.20
Loop Charge (NRC)	156.79
Expedited Handling Charge	313.10
Record Review Charge (per pair)	156.82
D. J. E'' 10E	
Dark Fiber IOF	
Verizon CO to Verizon CO	
Service Order SWC Installation Charge	61.63
IOF Milege Installation Charge	37.68
IOF Mileage Installation Charge EXPEDITE - Handling Charge	190.92
Verizon CO to CLEC Co	122.66
Service Order	00.01
SWC Installation Charge	63.21
Channel Term Installation Charge	37.68
EXPEDITE - Handling Charge	366.91
LATEUTE - Handling Charge	180.69
Dark Fiber Records Review	156.82
Dark Fiber T&M Charges	
Facilities Management Center- Planning/per	
hour	59.09
Facilities Management Center- Design/per hour	59.28
	33.20

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of
the transfer of the first terms of the first	PSC 12/06 Order
OSP Operations/splicing- NTE Technician/per	44.70
hour	41.79
CO Frame - CO Technician/per hour	41.27
EEL Voice Oreds (DOS)	
EEL - Voice Grade (DS0) Service Order	<u> </u>
Installation	61.63
Manual Surcharge	134.27
EXPEDITE	7.95
Service Order	70.00
Installation	78.08 197.12
Manual Surcharge	9.83
	9.83
Standalone NID	
Service Order	9.01
Installation -Time and Material- Labor Chg.	53.07
Installation - Add'l 15 min.	9.53
Field Dispatch	55.67
Manual Surcharge	18.00
EXPEDITE	10.00
Service Order	11.42
Installation - T&M - First 30 min	74.75
Installation - T&M - Add'l 15 min	13.43
Field Dispatch	77.02
Manual Surcharge	22.23
Daily Usage File	
Data Tape - per tape	
per Programming hour	66.66
CMDS - per message	
per Programming hour	66.66
DUF Transport	
9.6 kb Port - per month	
per Port NRC	8,552.71
56 kb Port - per month	
per Port NRC 256 kb Port - per month	35,394.48
per Port NRC	50 000 55
T1 Port - per month	58,920.86
per Port NRC	240.240.24
Line Installation - per programming hour	210,246.64
Port set up	66.66 10.70
Network Control Programming Coding - per	10.70
hour	66.66
	
PLATFORMS	

UNBUNDLED NETWORK ELEMENTS	DC Rates in Event of Stay of PSC 12/06 Order
POTS/Centrex/ISDN-BRI /ISDN-BRI Centrex/Coin/Public Access Platform New Initia	1
Service Order	0.97
Installation - w/o Visit - Initial	9.70
Installation w/Visit - Initial	123.76
Manual Surcharge	11.31
EXPEDITE	
Service Order	1.22
Installation w/out visit - Initial	13.59
Installation with visit - Initial	174.14
Manual Surcharge	13.98
POTS/Centrex/ISDN-BRI /ISDN-BRI Centrex/Coin/Public Access Platform New Additional	
Installation without visit	9.49
Installation with visit	48.24
EXPEDITE	
Installation without visit	13.29
Installation with visit	67.86
POTS/Centrex/ISDN-BRI /ISDN-BRI Centrex/Coin/Public Access Platform Migration Initial	
Service Order	0.97
Field Installation	
Installation without visit	1.18
Installation with visit	115.24
Manual Surcharge	11.31
EXPEDITE	
Service Order	1.22
Installation without visit	1.66
Installation with visit	162.21
Manual Surcharge	13.98
POTS/Centrex/ISDN-BRI /ISDN-BRI Centrex/Coin/Public Access Platform Migration - Addl	
Installation without visit	1.13
Installation with visit	39.88
EXPEDITE	
Installation without visit	1.60
Installation with visit	56.17
ISDN-PRI, DS1 DID/DOD/PBX PLATFORM - New -	
Service Order	9.24
Installation - w/o Visit - Initial	337.74
Installation w/Visit - Initial	489.02

	DC Rates In
UNBUNDLED NETWORK ELEMENTS	Event of Stay of
	PSC 12/06 Order
	TOURIST CITY
	13813838
Manual Surcharge	11.31
EXPEDITE	
Service Order	11.42
Installation - w/o Visit - Initial	488.41
Installation w/Visit - Initial	697.71
Manual Surcharge	13.98
ISDN-PRI, DS1 DID/DOD/PBX PLATFORM - New	-
Addl	
Installation without visit	328.62
Installation with visit	410.95
EXPEDITE	
Installation without visit	475.72
Installation with visit	589.63
ISDN-PRI, DS1 DID/DOD/PBX PLATFORM -	
Migration - Initial	
Service Order	0.99
Installation without visit	4.90
Installation with visit	120.74
Manual Surcharge	11.31
EXPEDITE	
Service Order	1.22
Installation without visit	6.97
Installation with visit	167.24
Manual Surcharge	13.98
ISDN-PRI, DS1 DID/DOD/PBX PLATFORM -	
Migration - Addl	
Installation without visit	4.74
Installation with visit	42.95
EXPEDITE	
Installation without visit	6.74
Installation with visit	59.61
ANALOG/POTS FX, ISDN-BRI FX PLATFORM -	
New - Initial	
Service Order	63.21
Installation - w/o Visit - Initial	216.65
Installation w/Visit - Initial	332.49
Manual Surcharge	11.31
EXPEDITE	
Service Order	78.08
Installation - w/o Visit - Initial	307.57
Installation w/Visit - Initial	467.84
Manual Surcharge	13.98
ANALOG/POTS FX, ISDN-BRI FX PLATFORM -	
New - Addi	
Installation without visit	204.49
Installation with visit	242.70

1. Kill 18 18 18 18 18 18 18 18 18 18 18 18 18	DC Rates in
UNBUNDLED NETWORK ELEMENTS	Event of Stay of
Programme and the second	PSC 12/06 Order
EXPEDITE	
Installation without visit	290.52
Installation with visit	343.39
ANALOG/POTS FX, ISDN-BRI FX PLATFORM -	0.0.00
Migration - Initial	
Service Order	0.99
Installation without visit	4.90
Installation with visit	120.74
Manual Surcharge	11.31
EXPEDITE	
Service Order	1.22
Installation without visit	6.97
Installation with visit Manual Surcharge	167.24
ANALOG/POTS FX, ISDN-BRI FX PLATFORM -	13.98
Migration - Addl	
Installation without visit	4.74
Installation without visit	42,95
EXPEDITE	42.30
Installation without visit	6.74
Installation with visit	59.61
	30.07
ISDN-PRI FX, DS1	
DID/DOD/PBX FX PLATFORM - New -	
Initial	
Service Order	63.21
Installation - w/o Visit - Initial	507.92
Installation w/Visit - Initial	659.20
Manual Surcharge EXPEDITE	11.31
Service Order	70.00
Installation - w/o Visit - Initial	78.08 730.56
Installation w/Visit - Initial	939.86
Manual Surcharge	13.98
ISDN-PRI FX, DS1	13.90
DID/DOD/PBX FX PLATFORM - New -	
Addi	
Installation without visit	498.80
Installation with visit	581.13
EXPEDITE	
Installation without visit	717.88
Installation with visit	831.79
ISDN-PRI FX, DS1	
DID/DOD/PBX FX PLATFORM -	
Migration - Initial	
Service Order	0.99
Installation without visit	4.90

UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of
	PSC 12/06 Order
Installation with visit	120.74
Manual Surcharge	11.31
EXPEDITE	
Service Order	1.22
Installation without visit	6.97
Installation with visit	167.24
Manual Surcharge	13.98
ISDN-PRI FX, DS1	
DID/DOD/PBX FX PLATFORM -	
Migration - Addl Installation without visit	·
Installation with visit	4.74
EXPEDITE	42.95
Installation without visit	6.74
Installation with visit	59.61
mountain with viole	39.01
HOT CUTS	
2W Hotcut Loop	
Service Order	5.00
Installation w/o Prem Visit - Initial	14.00
Installation w/Prem Visit - Initial	28.00
Installation w/o Prem Visit - Add'l	14.00
Installation w/Prem Visit - Add'I	28.00
Line Port Hotcut	
Service Order	5.00
Installation - Initial	10.63
4W Hotcut Loop	
Service Order	5.00
Installation w/o Prem Visit - Initial	5.00 14.00
Installation w/Prem Visit - Initial	28.00
Installation w/o Prem Visit - Add'l	14.00
Installation w/Prem Visit - Add'l	28.00
Query Back	14.46
	14.40
TC Not Ready	73.10
Expedite	108.39
Misdirect In	43.55
Expedite	59.80
Misdirect Out	116.74
Innounce: Out	116.74

Expedite	148.02
UNBUNDLED NETWORK ELEMENTS	DC Rates In Event of Stay of PSC 12/06 Order

	All the second	
COLLOCATION		
Physical Collocation		
Application Fees		
Initial - per request		5000.00
Augment - per request		2500.00
Augment - cable only		1500.00
Engineering & Implementation		
Initial - per request Site Augmentation		3481.18
		1095.88
Augment - cable only		550.00
Cable Installation and Support Structure - per cable	13.38	353.24
DC Power - per load amp, per feed	19.56	333.24
Space and Facilities Charge	19.56	
Per 100 sq. ft.		
Per 200 sq. ft.		32263.92
Per 400 sq. ft.		64527.84
Per sq. ft. addition (reduction)		129055.68
Cross-Connect - per svc., per month		322.64
VG - per 100 2WR Pairs	5.15	070 50
1.54Mpbs - per 28 DS1	154.98	879,58
44.736 Mpbs - per DS3	41.54	1335.66 341.31
Fiber Optic	41.54	341.31
Fiber Cross Connect (per 12 fibers)		
OC3	6.65	0404.00
OC12	6.65	2464.00 2464.00
OC48	6.65	2464.00
Service Connection Charge	0.00	2484.00
DS1		78.99
DS3		125.85
OC3		119.81
OC12		119.81
OC48		119.81
Building Space, per sq. ft.	2.27	110.01
SPOT Bay Frame and Terminations	2.2.	
Per 100 VG		498.00
Per 28 DS1s		629.24
Per DS3		120.23
Per 12 fibers		253.28
Security Access Cards		203.20
Per 5 Cards		90.88
SCOPE		50,50
Building Space, per equipment bay	34.05	
Construction, per equipment bay		4194.32
Cross-Connect - per svc., per month		7104.02
VG - per 100 2WR Pairs	5.15	879.58
1.54Mpbs - per 28 DS1	154.98	1335.66
44.736 Mpbs - per DS3	41.54	341.31
		041.01

UNE/RATE ELEMENT	Recurring Rate	Nonrequiring R
The Control of the Co		
	4. THE STREET	
	3.00	
Application Fees		
Initial - per request		5000.00
Augment - per request		2500.00
Augment - cable only		1500.00
Engineering & Implementation		1000.00
Initial - per request		3481.18
Site Augmentation		1095.88
Augment - cable only		550.00
Cable Installation and Support Structure - per cable		
		353.24
DC Power - per load amp, per feed	19.56	
Space and Facilities Charge		
Per 100 sq. ft.		32263.92
Per 200 sq. ft.		64527.84
Per 400 sq. ft.		129055.68
Per sq. ft. addition (reduction)		322.64
SPOT Bay Frame and Terminations Per 100 VG		
Per 28 DS1s		498.00
Per DS3		629.24
Per 12 fibers		120.23
Security Access Cards		253.28
Per 5 Cards		
CCOE		90.88
Application Fees		
Initial - per request		3500.00
Augment - per request		2500.00
Augment - cable only		1500.00
Engineering & Implementation		1000,00
Initial - per request		1723.16
Site Augmentation		1581.71
Augment - cable only		550.00
SPOT Bay Frame and Terminations		
Per 100 VG		498.00
Per 28 DS1s		629.24
Per DS3		120.23
Per 12 fibers		253.28
SPOT Bay Termination		
Per 100 Pair VG	0.89	
DS1, per 28 Per DS3	3.09	
Per DS3 Per 12 Fibers	0.59	
	2.06	
Building Space & Conditioning Per bay		
Security Access Cards	34.05	4194.32
Per 5 Cards		***
DC Power - per load amp, per feed	19.56	90.88
Cable installation and Support Structure - per cable	15.00	
casio incamanon and adhhorr andomia - bet cable		353.24
Cross-Connect - per svc., per month		
VG - per 100 2WR Pairs	5.15	879.58
1.54Mpbs - per 28 DS1	154.98	1335.66
• •		1000.00

The second secon	100	
UNE/RATE ELEMENT	Recurring Rate	Nonrecurring Rate
	100	
44.736 Mpbs - per DS3 Fiber Optic	41.54	341.31
Fiber Cross Connect (per 12 fibers)		
OC3	6.65	0404.00
OC12	6.65	2464.00 2464.00
OC48	6.65	2464.00
Service Connection Charge	0.00	2404.00
DS1		78.99
DS3		125.85
OC3		119.81
OC12		119.81
OC48		119.81
VIRTUAL COLLOCATION		
Application Fees Initial		
Augment		3500.00
Augment, cable only		1500.00
Engineering & implementation		1500.00
Initial Application		1760.93
Site Augmentation		2581.71
Augment, cable only		550.00
Cable Installation and Support Structure - per cable	42.93	
•	42.93	577.58
Land & Buildings		
Per Virtual Arrangement	20.43	
Per 1/4 Relay Rack	2.13	
Equipment installation & Engineering per unit of		
transmission/multiplexing equipment		
Mux Recabling - per unit		
Software Upgrade - per shelf		1821.32
Cross-Connect - per svc., per month		530.09
VG - per 100 2WR Pairs	5.22	879.58
1.54Mpbs - per 28 DS1	154.98	1335.66
44.736 Mpbs - per DS3	41.54	341.31
Fiber Optic		
Fiber Cross Connect (per 12 fibers)		
OC3	6.65	2464.00
OC12	6.65	2464.00
OC48	6.65	2464.00
Service Connection Charge DS1		
DS3		78.99 125.85
OC3		119.81
OC12		119.81
OC48		119.81
DC Power - per load amp, per feed	19.56	
Site Survey Report Fee		800.00
Security, Escort and Addt'l Labor		
Labor rates - per visit, per technician		
First half hour or fraction thereof		24.50
Each Addt'l half hour or fraction		24.50

UNE/RATE ELEMENT	Recurring Rate	
	Recuiring Kare	Nonrecurring Rate
The second secon		
MICROWAVE COLLOCATION		
Application Fees		
Initial - per request Augment - per request		5000.00
Augment - per request Augment - cable only		2500.00
Engineering & Implementation		1500.00
Initial - per request		3481.18
Site Augmentation		1095.88
Augment - cable only		550.00
Cable Installation and Support Structure - per cable	13.38	353.24
DC Devices manifest away workers		353.24
DC Power - per load amp, per feed Space and Facilities Charge	19.54	
Per 100 sq. ft.		32263.92
Per 200 sq. ft.		64527.84
Per 400 sq. ft.		129055.68
Per sq. ft. addition (reduction)		322.64
Building Space, per sq. ft. Security, Escort and Addt'l Labor	2.27	
Labor rates - per visit, per technician		
First half hour or fraction thereof		24.50
Each Add'l half hour or fraction		24.50 24.50
DEDICATED TRANSIT SERVICE		24.00
Service Order		
Standard Interval - per order		
		64.51
		04.51
Expedited Interval - per order		
Manual Intervention		80.41
Standard Interval - per order		
,		
		37.47
Expedited interval - per order		
Expedited interval - per order		
		46.71
Service Connection CO Wiring and Provisioning		
Standard Interval		
Per VG		
•		
		121.56

UNE/RATE EIENENT	Recurring Rate	Nonrecurring Rate
And the second second		
Per DS1		
		131.54
Per DS3		
252		175.75
Dark Fiber - per pair		175.75
		1/5./5
Expedited Interval Per VG		
		173.80
Per DS1		400.40
		188.42
Per DS3		
		251,48
Dark Fiber - per pair		
		251.48
Cross Connects Standard Interval	•	
VG - per 100 2WR Pairs	5.15	879.58
1.544 Mpbs per 28 DS1 Per DS3	154.98	1335.66
Dark Fiber (per 12 fibers)	41.54	341.31 177.82
OC3	6.65	2464.00
OC12	6.65	2464.00
OC48 CRTEE	6.65	2464.00
Application Fee		2500.00
DC Power - per load amp, per feed	19.56	2500.00
Physical Cable Installation and Support Structure -	13.38	353,24
per cable	13.36	353.24
Virtual Cable installation and Support Structure - per cable	42.93	577.58
Cageless Cross-Connect - per svc., per month		
VG - per 100 2WR Pairs	5.15	879.58
1.54Mpbs - per 28 DS1	154,98	1335.66
44.736 Mpbs - per DS3 Fiber Optic	41.54	341.31
Fiber Cross Connect (per 12 fibers)		
осз	6.65	2464.00
OC12	6.65	2464.00
OC48	6.65	2464.00
Virtual Cross-Connect - per svc., per month VG - per 100 2WR Pairs	5.22	879.58
1.54Mpbs - per 28 DS1	154.98	1335.66
44.736 Mpbs - per DS3	41.54	341.31
Fiber Optic		
Fiber Cross Connect (per 12 fibers) OC3	8.05	0404.00
OC3 OC12	6.65 6.65	2464.00 2464.00
OC48	6.65	2464.00
Escort Service and Addt'l Labor		
Labor rates - per visit, per technician		
First half hour or fraction thereof		
		26.92
Each Addt'l half hour or fraction		

26.92